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June 23, 2020

Via Electronic Filing

Honorable Karen M. Williams, U.S.M.J.
United States District Court – District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets – Courtroom 5C
Camden, NJ 08101

Re: Kristine Keyes v. Nationstar Mortgage, LLC, et al.
Civil Action No. 1:20-cv-02649

Dear Judge Williams:

This firm represents defendants U.S. Bank Trust, N.A. as Trustee for LSF9 Master Participation Trust (“U.S. Bank”) and Mortgage Electronic Registration Systems, Inc. (“MERS”) in the above-referenced matter. I submit this letter on behalf all parties who have entered an appearance in this action to jointly request an adjournment of the Fed. R. Civ. P. 16 scheduling conference, which is presently scheduled for July 16, 2020.¹

As Your Honor is aware, this matter was removed to this Court from the Superior Court of New Jersey, Law Division, Camden County, on March 11. (*See* ECF No. 1). Your Honor originally set the initial scheduling conference for April 16 (*see* ECF No. 2), which was adjourned to July 16 (*see* ECF No. 12). The parties request an adjournment in light of the pending dispositive motions, which include: (1) a motion to dismiss Plaintiff’s Complaint filed by U.S. Bank and MERS (ECF No. 9); (2) a motion to dismiss Plaintiff’s Complaint filed by Nationstar Mortgage, LLC (ECF No. 13); (3) a motion to dismiss Plaintiff’s Complaint filed by defendant Bank of America, N.A. (ECF No. 17); and (4) a motion to remand the case filed by

¹ The respective counsel for plaintiff Kristin Keyes, defendant Nationstar Mortgage, LLC, defendant RAS Citron Law Offices, and defendant Bank of America, N.A. consent to this request. Defendant Sheriff of Camden County has not yet entered an appearance, and its counsel is not yet known. Therefore, we were unable to consult that party for consent.



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Plaintiff (ECF No. 16).² These motions collectively have the potential of disposing of the case in its entirety. Therefore, the parties respectfully request that Your Honor adjourn the initial conference until a later date to be determined by the Court.

Thank you for your attention and consideration in this matter. Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Joy Harmon Sperling

Joy Harmon Sperling

Encl.

cc: Joshua Thomas, Esq. (via email)
David Neeran, Esq. (via e-mail)
Francesca Arcure, Esq. (via e-mail)
Michael Blaine, Esq. (via e-mail)

² I note that Plaintiff's counsel has indicated that his consent to this request is limited to Plaintiff's pending motion to remand, and not the defendants' motions to dismiss.